

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Nolvin Waldemar Munoz-Gonzalez,)	
)	
Petitioner,)	Case No. 220-107-916
)	
v.)	PETITION FOR WRIT OF
)	HABEAS CORPUS
)	
PATRICIA HYDE, Field Office Director,)	
MICHAEL KROL, HSI New England Special)	
Agent in Charge, and TODD LYONS, Acting)	
Director U.S. Immigrations and Customs)	
Enforcement, and KRISTI NOEM, U.S. Secretary)	
of Homeland Security,)	
)	
Respondents.)	
)	
)	

INTRODUCTION

1. Petitioner Nolvin Waldemar Munoz Gonzalez is a Guatemalan national with a pending Special Immigrant Juvenile visa petition. On information and belief, he was unlawfully detained by federal immigration agents on May 10, 2025.
2. Accordingly, to vindicate Petitioner's constitutional rights, this Court should grant the instant petition for a writ of habeas corpus.
3. Petitioner asks this Court to find that he was unlawfully detained and order his release.

JURISDICTION

4. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus) and 28 U.S.C. § 1331 (federal question).
5. Venue is proper because Petitioner resides and was detained at a location in the Commonwealth of Massachusetts, and on information and belief is detained in the District of Massachusetts.

PARTIES AND FACTS ALLEGED

6. The Petitioner, Nolvín Waldemar Muñoz-González, is employed and resides in Waltham, Massachusetts.
7. Respondent Patricia Hyde is the New England Field Office Director for U.S. Immigration and Customs Enforcement.
8. Respondent Michael Krol is the New England Special Agent in Charge for Homeland Security Investigations for U.S. Immigration and Customs Enforcement.
9. Respondent Todd Lyons is the Acting Director for U.S. Immigration and Customs Enforcement.
10. Respondent Kristi Noem is the U.S. Secretary of Homeland Security.
11. All respondents are named in their official capacities.
12. Petitioner is a Guatemalan national with a pending petition for Special Immigrant Juvenile status. On information and belief, he was detained without cause by U.S. Immigration and Customs Enforcement agents on May 10, 2025.
13. On information and belief, Petitioner is currently in custody at the Plymouth County Correctional Facility in the District of Massachusetts, and one or more of the Respondents is his immediate custodian.

CLAIMS FOR RELIEF

COUNT ONE

Violation of Fifth Amendment Right to Due Process

1. On information and belief, Petitioner is currently being arrested and detained by federal agents without cause and in violation of his constitutional rights to due process of law.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Order that Petitioner shall not be transferred outside the District of Massachusetts;
- (3) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.
- (4) Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment.
- (5) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately.
- (6) Grant any further relief this Court deems just and proper.

Respectfully Submitted,

/s/ Ruth O'Meara-Costello
Ruth O'Meara-Costello
(BBO No. 667566; First Circuit No. 1134285)
Law Office of Ruth O'Meara-Costello
875 Massachusetts Ave., Ste. 31
Cambridge, MA 02139
617-658-4264
ruth@ruthcostellolaw.com
Counsel for Petitioner

Dated: May 16, 2025